

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                  |   |                         |
|------------------|---|-------------------------|
| IN RE:           | ) |                         |
|                  | ) | Bankr. No. 19-22095-GLT |
| ALEXANDER ZESCH, | ) |                         |
|                  | ) | Chapter 13              |
| Debtor.          | ) |                         |
|                  | ) | Document No. ____       |
|                  | ) |                         |
|                  | ) | Related to Doc. No.     |

**OMNIBUS DECLARATION OF PLAN  
SUFFICIENCY FOR MORTGAGE PAYMENT CHANGES**

1. The mortgage loan held by the creditor named below is subject to payment fluctuations occurring more than twice per year. The debtor(s)' Chapter 13 Plan accommodates those payment fluctuations by providing for the payment of a set monthly amount to the creditor, designed to be at least, but not more than \$50 above, the average range of payment fluctuation over the preceding twelve (12) month period.

2. The debtor(s) hereby invokes excusal from the requirement to file amended plans and/or declarations as to the payment changes occurring during the plan term, as permitted by W.PA.LBR 3002-4(d).

3. The amount of the set monthly payment, and if applicable, the effective beginning date for that payment amount, is stated in the Chapter 13 Plan.

4. The amount of the set monthly payment has been calculated in the manner required by W.PA.LBR 3002-4(d)(1), and the calculation will be reviewed annually by the debtor pursuant to W.PA.LBR 3002-4(d)(2).

5. Contemporaneously with the filing of this declaration, the Chapter 13 Trustee and the affected creditor have been served with a copy of this declaration.

Name of creditor: Freedom Mortgage Corporation

Court claim number: 9

Dated: October 23, 2023  
Pittsburgh, Pennsylvania

Respectfully submitted,

CAMPBELL & LEVINE, LLC

/s/Kathryn L. Harrison

Kathryn L. Harrison, Esq.

PA I.D. No. 209601

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*Counsel to the Debtor*

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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on October 23, 2023, I served a true and correct copy of the *Omnibus Declaration of Plan Sufficiency for Mortgage Payment Changes* via United States First Class Mail, postage prepaid, upon the following:

Freedom Mortgage Corporation  
10500 Kincaid Blvd  
Fishers, IN 46037-9764

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Office of the United States Trustee  
Liberty Center.  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

Dated: October 23, 2023  
Pittsburgh, Pennsylvania

Respectfully submitted,  
  
CAMPBELL & LEVINE, LLC

/s/Kathryn L. Harrison  
Kathryn L. Harrison, Esq.  
PA I.D. No. 209601  
[kharrison@camlev.com](mailto:kharrison@camlev.com)  
310 Grant St., Suite 1700  
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Tel: 412-261-0310  
*Counsel to the Debtor*